

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 5,405,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference.²
- Defendants have produced approximately 2,151,000 documents and over 37.9 billion observations of data covering 8 different countries in this litigation to date, including approximately 13,000 documents since Defendants' last update on May 9, 2025.

Pursuant to the Court's instruction at the March 13, 2025 conference, Defendants further submit the following metric regarding Defendants' ongoing privilege review workflow.

- As of today, there are approximately 608 documents in Defendants' privilege review workflow that have been first-level reviewed and not yet produced or logged.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

² Due to a vendor error, Defendants' discovery update letters since March 28, 2025 unintentionally overstated the number of documents reviewed for responsiveness to Plaintiffs' document requests. Defendants have corrected the error in this letter and confirm that none of the other metrics reported to date have been affected.

Dated: May 23, 2025

Respectfully submitted,

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cc: All Counsel of Record (via ECF)